

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

PERIODIC REPORTING
(PROPOSAL THIRTEEN)

Docket No. RM2015-7

**NOTICE OF THE UNITED STATES POSTAL SERVICE OF
FILING OF USPS-RM2015-7/2**
(March 2, 2015)

The United States Postal Service hereby gives notice of the filing today of the folder listed below as part of the public annex in this docket:

**USPS-RM2015-7/2 Public Material Filed in Response to Informal Request
For Additional DOIS Data**

This material is provided in response to an informal request by UPS for additional DOIS data beyond the data used to support the proposal submitted by the Postal Service. Specifically, UPS requested that one of the datasets used to provide inputs for estimation of the Regular Delivery equations be augmented to include DOIS data on parcel/package volumes for the study routes on the collection study days in April-May of 2013. Although the Postal Service explained to UPS, for the reasons presented below, that it does not view the requested data as comparably suited for analysis as the other DOIS data used in the Postal Service models, the Postal Service nonetheless in USPS-RM2015-7/2 provides the requested data.

The Postal Service has previously provided some of the reasons why the data on parcels found in the DOIS database are deficient:

DOIS does not include a measure of accountable volumes. It does include a measure of parcel volumes but without distinguishing between those parcels that fit into the mail receptacle (and are thus delivered in the regular course of delivery) from those that do not (and thus require a deviation and/or customer contact). Because of these deficiencies, the

Postal Service has concluded that a field study will be necessary to update parcel and accountable variabilities.

Postal Service Report Regarding Cost Studies: Response to Order No. 1626 (April 18, 2013), Docket No. RM2011-3, at 18-19. Beyond that, it must be noted that, in contrast with the other DOIS volume counts upon which the Postal Service analysis relies, delivery units don't get any "credit" for the counted parcel volumes. Moreover, and also unlike other volumes (which are done by machine counts or linear measurements), accurate parcel counts are cumbersome to complete and may not be attempted. This accounts for the large amount of zero values in the data. Even for those delivery units that do submit parcel data, participation is not necessarily approached with the same intensity of focus on data quality that is applied when compiling data for which the delivery units are held accountable. Thus, although providing the data that UPS has requested, the Postal Service can in no way vouch for their reliability or utility.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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